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ABSTRACT

Designed to highlight those Comprehensive Employment and Training Act (CETA) regulations that are most pertinent to women, this guidebook interprets and explains relevant sections, details what the prime sponsors' obligations and responsibilities are, and what the rights of the public are in relation to the prime sponsors. The first of six major sections in the guide provides an overview of the CETA titles. In describing the prime sponsor planning process, section 2 outlines the three kinds of councils involved with CETA: (1) Prime Sponsor Planning Council, (2) Private Industry Council, and (3) State Employment and Training Council. The third section outlines the regulations that pertain to deliverer selection. The section of the regulations dealing with nondiscrimination, equal opportunity, equitable service, and affirmative action is summarized in section 4. The final two sections focus on procedures for serving specific target groups and for handling a complaint against a prime sponsor. Appended material includes CETA program eligibility estimates and a list of state CETA contacts. (LRA)

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CETA Journey: A Walk on the Women's Side

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A Booklet Which Documents CETA's Responsibilities to Women and Women's Access to CETA

U.S. Department of Labor
Ray Marshall, Secretary

Women's Bureau
Alexis M. Herman, Director

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FOREWORD

I am pleased to introduce this pamphlet as another special tool in support of the Bureau's efforts to make CETA responsive to women. Ever since the publication "A Guide to Seeking Funds From CETA," we have been aware of the need for a booklet that documents and highlights specific references in the regulations that can affect women. This publication was prepared to answer that need, and is intended as a companion piece to the Guide.

This booklet was also written to demonstrate how women's groups, agencies serving women, and women business owners can become knowledgeable about CETA and can become involved in the local planning and implementation. I encourage women and women's groups everywhere to familiarize themselves with CETA. Working together we can help develop and operate programs which will benefit women throughout the country.

Alexis Herman
Director, Women's Bureau

CONTENTS

	Page
Foreword	iii
Introduction	1
Overview of CETA Titles	2
Importance of Titles to Women/Women's Groups	3
Prime Sponsor Planning Process	4
Three Kinds of Councils	4
Prime Sponsor Planning Council	4
Private Industry Council	6
State Employment and Training Council	7
Prime Sponsor's Plans	8
Master Plan	8
Annual Plan and Subparts	10
Comment and Publication Procedures	13
Selection of Deliverers	16
Nondiscrimination, Equal Opportunity, Equitable Service, Affirmative Action	18
Procedures for Serving Specific Target Groups	21
When, Where, and How To Appeal	22
Summary	23
Appendixes	
A. Glossary	25
B. CETA Program Eligibility Estimates	27
C. Bibliography	30
D. Employment and Training Administration Regional Offices and States They Serve	31
E. State CETA Contacts	32
F. Women's Bureau Regional Offices and States They Serve	36

INTRODUCTION

The Comprehensive Employment and Training Act of 1973, generally referred to as CETA, was originally enacted to replace categorical Federal employment and training programs with a flexible and decentralized system for providing job training and employment opportunities for economically disadvantaged, unemployed, and underemployed persons. Most money authorized by CETA is made available to States, cities, counties, or combinations of general government units--the prime sponsors--to support programs designed to reduce structural unemployment. Some funds, however, are earmarked for Federal departments to conduct programs targeted at certain groups.

For CETA to be successful, it is essential that key labor market participants--management, unions, educational institutions, community organizations, women's groups, and minority interests--become involved in all aspects of CETA, from the planning stages up through the delivery of services.

The new language and subsequent implementing regulations emphasize the participation of women's groups in the CETA system. This publication is designed to be used as a reference that highlights those sections of the regulations that are most pertinent to women and women's groups. It interprets and explains the relevant sections of the regulations, details what the prime sponsors' obligations and responsibilities are, and what the rights of the public are in relation to the prime sponsors.

Though this CETA journey does not have a detailed itinerary, it does hit all the points of major interest. And it focuses on a dual approach to CETA: direct involvement by establishing contacts and working directly with prime sponsor staff, and community involvement with those groups and individuals that do, or could, have an impact on local CETA implementation. A glossary of terms used in this report appears as Appendix A.

This publication, "CETA Journey," will be most helpful if it is used in conjunction with a copy of the current Act (Public Law 95-524) and the current regulations (Title 20 of the Code of Federal Regulations, Parts 675 through 679). Since regulations and related documents such as the Forms Preparation Handbook are amended or revised from time to time, be sure that the copies you obtain are the most recent issuances.

Though all quotations from the regulations used in this publication are italicized (with specific references following each quote parenthetically), anyone interested in affecting CETA implementation is strongly advised to become thoroughly familiar with the complete CETA regulations. You should know which sections refer to which parts of the program, and be able to locate specific references easily and quickly. If you carry and use a well-marked copy of the regulations you are signaling your authority of knowledge.

Note: This publication was prepared for the Women's Bureau by L. Newquist-Carroll, Research Analyst.

OVERVIEW OF CETA TITLES

CETA has been amended several times, most recently in 1978. Though this publication focuses on Titles I, II, VI and VII, a brief description of CETA's eight titles follows.

Title I—Administrative Provisions—consists of two parts. Part A, Organizational Provisions, covers such matters as eligibility for prime sponsorship, requirements for master and annual comprehensive employment and training plans, judicial review action by the Secretary of Labor to terminate financial assistance because of failure to comply with the law, membership and duties of prime sponsor planning councils and State employment and training councils, and authorization of appropriations. Part B, General Provisions, covers such matters as wages and allowances, labor standards, prohibitions against political activities and discrimination, reports to Congress, and Federal access to records.

Title II—Comprehensive Employment and Training Services—has four parts. Part A, Financial Assistance Provisions, has the formula for allocation for the basic program, including supplemental vocational education assistance. Part B, Services for the Economically Disadvantaged, lists general activities for youth, older workers, and public assistance recipients. Part C, Upgrading and Retraining, sets standards under which public and private employers may provide upgrading and retraining programs, including supportive services. Part D, Transitional Employment Opportunities for the Economically Disadvantaged, has the allocation formula and eligibility and wages standards for the program under which economically disadvantaged persons who are unemployed are given transitional public service employment that is designed to enable participants to move into unsubsidized employment.

Title III—Special Federal Responsibilities—covers specific responsibilities of the Secretary of Labor, generally handled by national office staff. In Part A, Special National Programs and Activities, the Secretary is directed to undertake programs to meet the employment-related needs of certain groups who face particular disadvantages in specific and general labor markets or occupations. Part B, Research, Training and Evaluation, requires the Secretary to establish a comprehensive program of employment and training research to aid in the solution of the Nation's employment and training problems. It also requires the Secretary to develop and make publicly available a comprehensive system of labor market information and to provide for the continuing evaluation of activities under the Act and the extent to which they meet the needs of various groups.

Title IV--Youth Programs—relates to the Job Corps, youth employment demonstration programs, and the summer youth program.

Title V--National Commission for Employment Policy—details the composition and function of this advisory body.

Title VI—Countercyclical Public Service Employment Program—authorizes a special program to provide for temporary public employment during periods when the national rate of unemployment is high.

Title VII--Private Sector Initiatives for the Economically Disadvantaged--is intended to demonstrate the effectiveness of a variety of approaches to increase the involvement of the business community, including small business and minority business enterprises, in activities under the Act, and to increase private sector employment opportunities for unemployed or underemployed persons who are economically disadvantaged. Prime sponsor activities under the title are to augment private sector-related activities under Title II, including arrangements for on-the-job training with private employers.

Title VIII--Young Adult Conservation Corps--details a program under which unemployed individuals aged 16 to 23 are referred by the Secretary of Labor for year-round projects administered by the Secretaries of the Interior and Agriculture. Participants are assigned to residential or nonresidential centers and work in such areas as tree nursery operations, wildlife habitat improvements and preservation, and recreation developments.

Importance of Titles to Women/Women's Groups

As previously stated, this publication will focus on the pertinent provisions of Titles I, II, VI, and VII, since those are the titles of most relevance to women's groups. Title I is important because of its administrative and planning requirements, and Titles II, VI and VII, because most of the allocations made to prime sponsors for program operations are made under these three titles.

PRIME SPONSOR PLANNING PROCESS

The CETA legislation clearly reveals that Congress intended this to be a community participation program, and that women, as well as other significant segments of the population, would have a voice in the design of CETA programs that serve their area. You have the right, therefore, as well as the responsibility, to see that the CETA program in your community serves the needs of women. It is unlikely that a significant impact can be made without a thorough knowledge of the mandates under which CETA prime sponsors must operate. The journey through the CETA system is designed to help you in this learning process.

The first thing prime sponsors have to do is develop a plan of action called the Comprehensive Employment and Training Plan (CETP). It must be detailed and specific and well thought through, because once the CETP has been submitted and approved, the prime sponsors will be continually evaluated on how well they are sticking to the plans. Not meeting the goals in the plan can result in various kinds of adverse actions, the worst of which is loss of future funding. Therefore, women's organizations which are able to get involved in the prime sponsor's planning process have a significant opportunity to affect the level and types of services provided to a community through CETA, as well as the characteristics of the clients who will be served.

Three Kinds of Councils

Prime Sponsor Planning Council. The prime sponsor must appoint a group of people, representative of the community to be served, to participate in the development of the CETP. This group is called the Prime Sponsor Planning Council.

The Federal regulations (and the law) are very specific about the composition and duties of the planning council. First of all,

> *Each prime sponsor shall establish a planning council (676.7(a))*

It's not optional, it's mandatory. And furthermore,

> *Each prime sponsor shall appoint to its planning council members broadly representative of the significant segments (see Glossary) who are representative of the eligible population (676.7(b))*

Since "significant segments" refers to groups of the population identified by the demographic characteristics of age, sex, race, and national origin, this means that members of the planning council should be broadly representative of the number of women who are CETA-eligible in the area to be served.

CETA is a political process and is sensitive to political pressure. See the elected official who is responsible for the particular program in your area (Governor, mayor, city council member, etc.). Talk with other members on the planning council; establish firm contact with key staff members, talk with the U.S. Department of Labor Regional Administrator who is responsible for monitoring CETA performance. (See page 22 for more information on the appeals process.)

In studying the makeup of the planning council, you should keep in mind the following statement from the regulations:

> *Each mandated planning council member shall not represent more than one of the above groups or organizations and shall have voting privileges. Staff of State or local government agencies shall not take the place of representatives of the participant communities which their agencies serve.* (676.7(b))

The regulations also require that the functions of the planning council will be public functions, and this makes it possible for interested persons to monitor the actions the planning council takes.

> *The Planning Council shall: Meet no less than five times per year. The meetings shall be publicly announced, open and accessible to the general public, and a record of the proceedings shall be maintained by the prime sponsor at a location accessible to the public.* (676.7(d))

The requirement for publicly accessible records of the proceedings allows research to be done on previous council actions, and allows proposals and/or complaints to be based on historical documentation. This is very important. Your homework has to be done first, then action strategies can be developed.

The planning council is charged with a very specific set of responsibilities. It shall:

> *Actively participate in the development of, and submit recommendations regarding, the prime sponsor's CETP and the basic goals, policies, and procedures of the prime sponsor's program.* (676.7(d)(2))

Again, it is quite clear that Congress intended this to be a community participation program, wherein the members of the community that are to be served are represented in the key formulation process. Women are a clearly designated segment of that community, specifically named in the Act as well as the regulations, and should be represented on the planning council and play an important role in determining <u>basic goals, policies, and procedures of the prime sponsor's program</u>.

It probably sounds easy, by now, to assure that women are treated equitably by CETA prime sponsors, but the regulations also state that:

> *Special consideration shall be given to the recommendations of the planning council, but any final decisions with respect to such recommendations shall be made by the prime sponsor.* (676.6(e))

Prime sponsors do not have to accept any of the recommendations of the planning councils—not one. They merely have to give them "special consideration." Though in most areas the prime sponsors take the recommendations of the planning council seriously, there are areas where the council is only a rubber stamp for the decisions of the prime sponsor.

This is where research into the history of a planning council can pay off. Read the minutes, and re-read them. Who made the recommendation? Was there any debate? Was there even a discussion? What has the attendance rate been at previous meetings? Research the significant issues that have been raised, explore what the regulations have to say about those subjects, and then attend the next meeting. But don't waste time by going unprepared. Knowledge is power--and a question or argument based on hard, incontrovertible facts is a winner. If not, see page 22 which discusses when, where, and how to appeal.

Private Industry Council. There is another kind of council, called the Private Industry Council (PIC), which most prime sponsors will also have established. In fact, a PIC is required in order to receive funding under Title VII.

> *To receive financial assistance under this Part (Title VII), each prime sponsor shall establish a Private Industry Council (PIC). (679.3-1(a))*

As with the prime sponsor's planning council, the duties of the PIC are also detailed.

> *Its purpose shall be to increase the involvement of the business community, including small business ...in employment and training activities under the Act, and to increase private sector employment opportunities for economically disadvantaged persons. (697.3-1(a))*

A PIC offers opportunities similiar to a planning council in providing a way to get involved in program design and in decisions regarding who will be served.

A PIC may not be quite as accessible as a planning council should be, but a concerned and interested woman or women's group ought to be able to gather all necessary and pertinent information for active involvement.

> *Gererally, meetings of the PIC shall be open and accessible to the general public, and minutes shall be maintained.(679.3-1(c))*

A list of PIC members should be available from the prime sponsor, who may also be able to provide copies of the minutes of previous meetings. A thorough perusal of all available material regarding the PIC and its functions (including a good understanding of all that the regulations say about it) will streamline involvement in key issues and aid you in working with PIC members.

The prime sponsor appoints the members of the PIC, and a majority of the membership should be representatives of industry and business. (679.3-2). But the regulations state that women's organizations can make recommendations to the prime sponsor regarding appointments.

The prime sponsor shall make ultimate decisions regarding the membership of the PIC after soliciting and considering the recommendations of the business and industrial community. Additionallly, the prime sponsors should consult with...women's organizations... and other organizations expressing an interest in the Title VII program. (679.3-2(a)(3))

So, express an interest! (And express it in writing as well as personally.) If you can help get a person who is sympathetic to the concerns of your group appointed to the PIC, you will have an effective advocate for your cause.

No one, however, will be as effective an advocate for your interests as you could be yourself. If you are a woman who owns her own business you may be able to serve on the PIC.

The prime sponsor shall make every effort to recruit business and industry members for the PIC who will be representative of the private for profit employment community in terms of the types of business represented, such as...businesses owned by women...and others reflective of the commercial and industrial makeup of the area. (679.3-2(b)(1))

If you do not own your own business, perhaps you know someone who does who could make a valuable contribution to the PIC, and for whose appointment you should gain support. Or, perhaps you are, or know someone who is, a member of a community-based organization. The prime sponsor is required to appoint at least one representative of:

Community-based organizations that have demonstrated to the prime sponsor a record of effectiveness in their relationships with the business community. (679.3-2(c)(2))

There is, in the regulations, a long description of the functions of the PIC (679.3-7). This should be considered mandatory reading for any groups wanting to affect the Title VII program in their area. In addition to general instructions, there are detailed descriptions of planning and coordination, operational functions, and review and assessment. There are also short sections on accountability (679.3-8) and conflict of interest (679.3-9). These are directions and strictures which govern the operation of the PIC, and before attempting any involvement with it you should be as familiar (if not more so) with the regulations as the prime sponsor, the prime sponsor staff, or members of the PIC. Remember, knowledge is power.

State Employment and Training Council. The Governor of each State shall establish a State Employment and Training Council (SETC) which is to be representative of the geographic area to be served (677.36(a)). The SETC is an advisory body whose main function is to assure non-duplication of services, and that appropriate available services are utilized. To perform this function the Council must

Review continuously the operation of programs conducted by prime sponsors in the State...(677.36(b)(4))

and.

Review proposed CETP and modifications of prime sponsors, and comment thereon...(677.36(f)(5))

There may be times when an awareness and knowledge of the SETC will be helpful--particularly in cases of non-utilization or duplication of services.

An individual who is thoroughly acquainted with the Federal regulations that govern CETA will know which issues should be addressed to which of these three councils, and will be able to assess the performance of all three: the planning council, the PIC, and the SETC.

Prime Sponsor's Plans

As stated earlier, in order to receive CETA funds from the Federal Government each prime sponsor must submit a Comprehensive Employment and Training Plan (CETP). The CETP has two separate parts: The Master Plan and the Annual Plan.

The Master Plan serves as the long-term agreement between the Department of Labor and the prime sponsor, and is submitted only the first time a prime sponsor applies for Federal funding under CETA--though it may be modified in subsequent years. The Annual Plan specifies the amount of money requested for the coming fiscal year and how the prime sponsor intends to use it. As the name suggests, it must be submitted each year.

Master Plan. One of the key elements of the Master Plan is the required description of the geographic area, the population, and the labor market. The regulations say that the narrative description shall include:

> *A detailed description of the geographic area to be served and demographic characteristics of the population (with data, if available, indicating the number of potential eligible participants from each significant segment and their income and employment status).* (676.10-4(b)(1))

Remember what you're looking for here. Even though women may be 50 percent of the general population in your area, they may be 55 or 65 percent of the CETA-eligible population. (See Appendix B.)

You may want to doublecheck the prime sponsor's demographic data. One way to do this is to find other organizations which have done surveys of local populations that will give you figures to compare with those used by prime sponsors. Health organizations are one possibility; State Commissions on the Status of Women, the Displaced Homemaker Network, Inc., and the Older Women's League are three others. Senior citizen organizations may have collected data on older women--the possibilities are numerous. Although data collected in this way may not be absolutely statistically reliable, it may still be quite useful in local situations to negotiate changes in the demographic description of the Master Plan.

Another key element of the Master Plan is the requirement that the prime sponsor include:

> *A description of arrangements to ensure that employment and training services are provided to those individuals most in need...* (676.10-4(c)(1))

and

> *The method used to determine priorities for service based on objective locally established criteria using such factors as employment status, household status, level of employability development, handicap, veteran status, age, race, sex, or other criteria established by the prime sponsor.* (676.10-4(c)(1)(ii))

Examine this part of the Master Plan carefully. Are the criteria for selection of target groups biased against women? Do the target groups include women or subgroups of women? Some women have historically been underserved by employment and training programs. Specifically these are: minority women, older women, and single parents. Other subgroups that may need special recruitment efforts are teenage parents, displaced homemakers, rural women, and welfare recipients. Has the prime sponsor given any indication that consideration was given to serving women in these categories?

The Master Plan must also contain a description of procedures and criteria used to select service deliverers. This includes:

> *A description of the criteria used to designate programs of demonstrated effectiveness (see Glossary)* (676.10-4(d)(2))

and

> *A description of procedures for giving special consideration to employment and training programs of demonstrated effectiveness which are operated by community-based organizations* (676.10-4(d)(3))

In many areas programs that exist to aid and support women may not have been in existence long enough, or there may not be other similar organizations for comparison, that will allow the prime sponsor to apply the "demonstrated effectiveness" criteria. In this case, strive to reach an agreement with the prime sponsor that will provide assurances on both sides (i.e., that the fledgling women's organization will be responsive and responsible to the prime sponsor, and that women will be adequately served by CETA).

The regulations also require in the Master Plan:

> *A description of procedures used to ensure the participation of, and consultation with, local educational agencies, vocational education agencies, community-based organizations, Federal and State agencies, organized labor, apprenticeship programs, business and other institutions and organizations, including women's organizations, in the conduct of programs.* (676.10-4(e)(3))

The prime sponsor is to ensure the participation of, and consultation with ...you. But that won't happen unless the prime sponsor knows of your existence and your interest. It is your responsibility to initiate the dialogue.

The next quote from the regulations concerns nondiscrimination and equal opportunity, and it says that the prime sponsor is required to include in the Master Plan:

> *A description of the mechanism which will be used to ensure nondiscrimination and the provision of equal opportunities.*
>
> *A description of plans and procedures concerning affirmative action, as described in 676.54.*
>
> *A description of efforts and procedures to eliminate artificial barriers to employment and occupational advancement for CETA participants, including the hiring, licensing and contracting activities of subrecipients and contractors of the prime sponsor.* (676.10-4 (h) (1, 2, & 3))

Some of the barriers to employment for women are a lack of adequate child care facilities, a lack of adequate transportation, a lack of versatile work schedules, indefensible physical requirements, employer biases, and age limitations for apprenticeships. Has the prime sponsor addressed these specific issues in the Master Plan? Adequately? Can you offer suggestions that will strengthen the Master Plan in these areas?

The other items quoted above will be dealt with in more detail in the section on nondiscrimination, but they have been included here because it is important to know that the prime sponsor is required to consider all these issues and address them before funding is ever granted.

Annual Plan and Subparts. The Annual Plan, submitted as part of the CETP, includes the amount of money being requested and a brief summary of the proposed program and activities. It must also have:

> *A description of specific programs or services . . . designed specifically for those segments of the population who are experiencing severe handicaps in obtaining employment, including individuals who . . . are displaced homemakers . . . are single parents, are women or other individuals having particular disadvantages in the labor market.* (676.11(c) (5) (i))

Study the Annual Plan and look for the description of these programs or services. Is it there? Is it adequate? Does it deal with recruitment and intake as well as training and job placement? Are there ways it could be improved? Don't worry the prime sponsor with insignificant amendments, but if there are serious deficiencies in the plan, or important ways that services to women can be improved, you have the authority of the law and the regulations behind you if you choose to become involved.

The Annual Plan must also include:

> *A description of the plans and methods to be used to provide opportunities for minority-owned businesses (including those owned by women), to compete for procurement contracts such as the use of set-asides where appropriate.* (676.11(c)(5)(iv))

This means that the prime sponsor may choose to set aside certain sums of money for procurement contracts that may go only to minority-owned businesses (including those owned by women). This provides a much more favorable competitive climate for those businesses that can qualify for the set-aside funds. If you know of businesses that are owned by women, and that can provide goods or services that the prime sponsor will be using, pass the word about set-asides--or other methods the prime sponsor has established in order to provide opportunities for these businesses. If you cannot find anything like this in the Annual Plan, talk with the prime sponsor and find out how this particular section of the regulations is being complied with. If it is not, be ready to make suggestions. And if the prime sponsor is not receptive, carry your concern to the next highest level. (See the section on When, Where, and How To Appeal.)

The Annual Plan should also contain:

A description of how program activities will contribute to occupational development, upward mobility, development of new careers and overcoming of sex stereotyping, including procedures which will lead to skill development and job opportunities for participants in occupations traditionally limited to individuals of the opposite sex. (676.11(c)(5)(v))

By now you can see that the prime sponsor staff has an enormous task just to complete the Annual Plan, before they can even turn their attention to running the programs. The involvement of interested community organizations or individuals can be a boon to the prime sponsor if such involvement is manifested in a constructive and helpful manner.

One of the best, but frequently overlooked, ways to try to overcome sex stereotyping in employment is by the establishment of special procedures for the intake interviewers. The CETA legislation requires that each participant in a Title II program must have an Employability Development Plan (EDP). As the name suggests, it is an individualized plan of action for moving a participant through training and into unsubsidized employment, and is developed jointly by the interviewer and the participant, taking into consideration the participant's interests, skills and previous experience. At least, that's the way it should work. Because the easiest and quickest of that information to document is previous work experience, that frequently becomes the primary factor in developing future employment plans. Since most women have worked only in jobs that are traditionally female occupations, using this history to project future employment only perpetuates sex stereotyping. This problem is compounded by the unawareness of most participants of the broad range of occupations that may actually be open to them.

It takes more time and perhaps even special training for the intake interviewer to explore these possibilities, and to probe for interests and aptitudes of the client that might match up to a nontraditional job. But this is an area that might well be improved by the involvement of interested individuals and/or organizations. You might also ask the prime sponsor to consider establishing (if it does not already exist) an orientation for all new clients that would expose them to numerous occupational categories so that they can take a more direct and positive role in the development of their own EDP's. Perhaps you could offer to do this on

a volunteer basis for a predetermined period of time, with the understanding that if it appears effective you can apply for funding to continue the project. Always be sure that in discussions of this nature you point out to the prime sponsor the advantages that can accrue to him/her through your proposal. In this case, if more women enter nontraditional jobs, the average entry level wage will probably increase and the prime sponsor has a demonstrably more effective program.

The Annual Plan will contain several subparts which relate to the various titles and sections of the Act and the regulations. The Annual Plan subparts for both Titles II and VI require:

> *A breakout of the eligible population by race, sex, national origin, and age, and the planned level of services to be provided for these significant segments in terms of the percent each group will constitute of those to be served.*
>
> *Where the planned level of service to any significant segment varies above or below the group's incidence in the eligible population, a justification must be provided.* (677.15(b) (1) (ii) and 678.6(b) (1))

The language in Title VII is identical (679.5(d)(1)(ii)), except that it begins by saying that the narrative description of the Annual Plan subpart shall analyze the eligible population. The rest of the reference is the same and the difference between "analyze" and "provide a breakout" is not significant.

The problem of collecting and analyzing demographic characteristics of the population was discussed on page 8, but here the regulations insist on a detailed description of the levels of service to be provided to the significant segments. Examine this part of the Annual Plan. Are the levels of service that have been planned consistent with each groups' representation of the total significant segments? Check the various categories of training, vocational and on-the-job and public service. Are women and subgroups of women properly represented in all of these areas? If not, how has the prime sponsor justified this? Is the justification logical and reasonable?

Part B of Title II (Training Activities for the Economically Disadvantaged) has a reference that will be particularly important to those clients with children. The regulations state that the following may be undertaken:

> *Part-time, flexi-time, and other alternative work arrangements for individuals who, because of age, handicap, or other factors, are unable to work full-time.* (677.13(b)(6))

The prime sponsor is not required to strive for these arrangements, but may. This is another area where interest and encouragement from outside sources may be effective.

When looking at Title II, Part C (Upgrading and Retraining), it is most important to keep in mind the purpose of that Part as stated in the regulations.

> *Upgrading and retraining programs offer additional opportunities to those groups, particularly minorities and women, who are frequently locked into low-paying, dead-end jobs.* (677.21)

Title VII (Private Sector Initiative Program for the Economically Disadvantaged) also has some things to say about upgrading and retraining, and it allows:

> *Up to 6.5 percent of funds allocated under Title VII may be used to enroll persons...into upgrading and/or retraining programs. Up to 20 percent may be used if, in the case of upgrading programs, the employer agrees to hire at least one economically disadvantaged person for each employee upgraded, or if, in the case of retraining programs, regional administrator approval is first obtained.* (679.6(b)(3)(i))

Because both upgrading and retraining are so important in helping women move into equitable employment status, the maximum use of this provision is to the advantage of women. Here, again, making personal contacts within the community can be useful. Do you know employers who might want to take advantage of this? Talk to them. Point out the benefits to them of participating. Offer to get them together with someone on the prime sponsor's staff. Encourage the PIC as well as the prime sponsor to plan to use the full 20 percent allowable for upgrading and retraining (and make sure that this effort is coordinated with a serious look at the part of the plan that details who is to be served and what the levels of service are to be).

There is one more area of vital concern to women that needs to be considered when examining an Annual Plan. The CETA legislation and regulations allow for the provision of supportive services. These include, but are not limited to:

--Health care and medical services
--Child care
--Transportation
--Temporary shelter
--Assistance in securing bonds
--Family planning services (voluntary basis only)
--Legal services
--Financial counseling and assistance

Many of these services are essential to women who want to become employed, and the level and quality of these services will be critical in determining how many, and how well, women are served. The same part of the regulations (676.25-5(c) and (d) also allow for these services to continue for up to 90 days to participants who have obtained unsubsidized employment to enable them to retain employment.

Comment and Publication Procedures

Sometimes the hardest part of getting involved with CETA is finding out what's going on. In line with the intent of Congress that CETA be a community participation program, the regulations contain many provisions to assure that interested members of the community can learn about their local and State programs.

The entire section (676.12) Comment and Publication Procedures Relating to Submission of the CETP is very useful and should be studied carefully; however, a few excerpts from this part of the regulations may be helpful.

> *Prime sponsors shall make public the provisions of the plan prior to submission to the RA (Regional Administrator) through such means as public hearings, public notice in newspapers, bulletins, or other media, including publications that primarily serve significant segments of the eligible population.* (676.12(a))

Not only that, but the prime sponsor must also publish the location and hours when the CETP and a comparison of performance against the prior year's plan can be reviewed, and the address and phone number where questions and comments may be directed. This must be done at least 45 days prior to submission to the RA in order to allow at least 30 days for review and comment. (676.12(b)(2))

The comment and publication procedures are a rather complex business and there is a way that the prime sponsor can make the task a little simpler. During the publication process

> *The prime sponsor may include a statement indicating that subsequent modifications to the CETP will not be subject to these publication requirements:* Provided, *that the notice states that interested groups, organizations, or individuals may notify the prime sponsor of their desire to review any subsequent modification during the grant year.* (676.12(b)(3))

So, get your notification in. If you do express your interest, the prime sponsor must maintain your name and address on a list and provide you with a copy of any modifications 30 days prior to submission to the RA.

Women's organizations have a double assurance that they will have a chance to review the CETP because, in addition to the regulations quoted above, another section states that

> *...each prime sponsor shall provide written notification to ... appropriate women's organizations* (among others) (676.12(d))

The regulations further provide that

> *A prime sponsor shall acknowledge all written comments and shall inform in writing any party submitting a substantive written comment of whether any Plan revision will be made in response to the comment, and the reasons for the prime sponsor's determination.* (676.12(g))

This is an excellent assurance that all substantive written comments will be thoroughly reviewed. But your chances of really having an impact on the program will be much better if you precede your written comments with a personal visit to the appopriate person (the program planner, perhaps), and follow up with the same person a little while after submission. This will give you a chance to explain any points that perhaps were not as clear as you had intended, and to answer questions about your position. And, of course, a personal contact is usually much more effective than just written communication. Do both.

But what if you have missed the publication and comment period, and still want to look at the CETP? The first thing to do is to call the prime sponsor. Prime sponsors may not have extra copies, as the CETP is bulky and expensive to reproduce, but they should have a copy that you can study in the office. If you have any questions, make a list of them and request an appointment to come back and discuss your questions with the appropriate person.

If you are unable to see the CETP via the prime sponsor, then try the Governor's Office. And as a last resort you can contact the Women's Bureau staff in the regional office of the Department of Labor. They should be able to help you find what you need.

SELECTION OF DELIVERERS

When the prime sponsor is ready to select organizations to deliver services and provide goods under a subcontract arrangement, many sections of the regulations must be complied with. First of all, the Master Plan must contain:

> *A description of the criteria used to designate programs of demonsirated effectiveness* (see Glossary) *(676.10-4(d)(2))*

When you have a copy of the CETP in hand you will be able to turn to the section of the Master Plan that contains these criteria and learn exactly how your application or proposal will be reviewed and assessed. A good proposal will meet all of the specified criteria, or (not as good) will explain why certain criteria are not applicable.

The Master Plan will also include

> *A description of procedures for giving special consideration to employment and training programs of demonstrated effectiveness which are operated by community-based organizations. (676.10-4(d)(3))*

Get familiar with these procedures to learn how your organization can qualify. But also be familiar with, and examine, them to see if they are logical and fair. If they are not, work to get them revised. Make positive suggestions.

The regulations also require that

> *Prime sponsors shall compile and maintain a publicly available inventory of potential service deliverers which have expressed in writing an interest in being on the inventory. (676.23(b))*

If your organization is interested in being on this inventory, then submit to the prime sponsor (1) the name of your organization, (2) the types of service and activities your organization is interested in providing, and (3) the types of services and activities your organization has provided in the past, the number and types of people served, and documentation regarding the effectiveness of these services. And remember there is little point in submitting this information if the services you are offering are not services that the prime sponsor has included in the CETP. Prime sponsors are evaluated on how well they performed what they said they were going to do. If the services your organiztion can provide are important ones, but not in the plan, then work on getting the plan revised first.

And be forewarned; the time between the issuance of a request for proposal (RFP) by the prime sponsor and the due date for such proposals is usually very short. Your proposal should be almost ready for submission before the RFP is published. That way you'll be allowing yourself plenty of leeway for fine-tuning of your proposal so that it will represent a very professional piece of work.

A follow-up procedure is also stipulated in the regulations.

> *If the prime sponsor, after considering a CBO of demonstrated effectiveness as a service deliverer does not select such CBO, it shall, upon request, provide the reasons for non-selection in relation to its criteria for selection to the affected CBO and the RA.* (676.23(c)(2)(v))

One other item must be highlighted regarding service delivery and subcontracts with the prime sponsor, especially since there has been some confusion over this issue in the past.

> *Subrecipients are entitled to funding for administrative costs. The amount of such funding will be determined during the development of subgrants.* (676.37(a)(4))

If you receive a contract you <u>are</u> entitled to funding for administrative costs. The amount is negotiable, and you should document the need for whatever you request, but if you request it, you should get something for administrative costs.

NONDISCRIMINATION
EQUAL OPPORTUNITY
EQUITABLE SERVICE
AFFIRMATIVE ACTION

The section of the regulations dealing with nondiscrimination, equal opportunity, equitable service, and affirmative action is replete with precise and detailed requirements with which prime sponsors must comply. This is a section that is almost worth memorizing (it would be impressive to refer to an appropriate paragraph of the regulations by number without using notes). Although this entire section needs careful study, a few items especially deserve highlighting.

> *No person shall, on the ground of race, color, religion, sex, national origin, age, handicap, or political affiliation or belief be discriminated against, or denied employment as a participant, administrator, or staff person, in connection with any program under the Act.* (676.52(a))

This is standard language, by now, but nonetheless important for its familiarity. Less common but also important is the following:

> *All programs, to the maximum extent feasible, shall contribute to the elimination of sex stereotyping. Prime sponsors, in planning their program activities, shall: Recruit for, and encourage, female entry, through such means as training, into occupations with skill shortages where women represent less than 25 percent of the labor force...* (676.52(b))

This, then, is an area where you might want to do some research of your own. What occupations in your area have skill shortages? Do women represent less than 25 percent of the labor force in those occupations? And don't forget, the regulations require that the prime sponsor recruit women for those applicable occupations. Is that happening? Is it effective? The regulations also require the same effort to be applied for males in skill shortage occupations where they represent less than 25 percent of the labor force.

Prime sponsors must establish procedures to ensure against discrimination and to foster equal opportunity (676.52(e)), and must assign someone full time to equal opportunity responsibilities--or explain why they haven't in the Master Plan (676.52(f)).

These provisions are all-encompassing, as can be seen in the following quote:

> *Members of the eligible population shall be provided maximum feasible opportunities for employment in the administration of programs, including staff positions in which they will have opportunities for occupational training and career advancement.* (676.52(g))

"Maximum feasible opportunities" is certainly open to subjective interpretation, but the intent of the regulations is clear. Especially if one reads on a little farther.

Each recipient (prime sponsor) shall take affirmative action to recruit and hire qualified staff who will reflect the significant segments of the population residing in the area by age, race, sex and national origin. (676.54(a))

The next section gets tricky. Again the intent is clear, but following up on this one can get complicated. The regulations say:

CETA recipients shall provide employment and training opportunities on an equitable basis to significant segments of the eligible population (age, race, sex, or national origin group). (676.53(a))

A straighforward statement, easily understood. But how can you learn if women have received equitable employment and training opportunities? The prime sponsor is required to complete the following four reports: Quarterly Summary of Participant Characteristics, Program Status Summary (both completed quarterly--cumulative to date), Annual Report of Detailed Characteristics, and Annual CETA Program Activity Summary. These reports are part of the public information file and you should be able to examine them at the CETA office. A description and explanation of these reports can be found in the Forms Preparation Handbook, published by the Department of Labor, Employment and Training Administration.

Unfortunately, these reports will probably not give you all the information you need, though they can be useful and should be studied. The results of a 1980 study by the General Accounting Office (GAO) of 11 prime sponsors showed that their programs "generally did not adequately serve women, the handicapped, people age 45 and older, and some minorities, especially in on-the-job training and public service employment." Further, the GAO said, "The data Labor periodically collects from prime sponsors on the characteristics of CETA participants are inadequate for Labor to determine whether CETA is equitably serving all segments of the population."

There is one other way that the necessary information can be obtained. All of this information is contained in the participant files, even though prime sponsors are not required to tabulate some of it. A file is maintained for each participant in local CETA programs, and the application forms for those who did not enter are kept for one year. An examination of these participant and applicant files, and an aggregation of pertinent data found therein, should demonstrate clearly whether or not prime sponsors are providing equitable service.

These files are not, for obvious reasons of privacy, part of the publicly available information. Any access to, and survey of, the data in these files should be granted only to a group or organization of sound and responsible reputation who is conducting a statistically reliable review. This permission may be hard to come by, but it is not impossible. Other organizations have done it. Again, pointing out to the prime sponsor (or the planning council, or the Governor, or the RA) the advantages to them in knowing precisely who has been served and how they've been served, is a much more effective approach than confrontational demands. It may also be that another group (or the prime sponsor) has already tabulated this data, and it may be available for the asking. Don't create unnecessary work for yourself or the prime sponsor, but do pursue diligently the information that is essential.

In addition to requiring the prime sponsor to provide services equitably to the significant segments the regulations also say:

> *The recipient (prime sponsor) shall take positive steps, such as active recruitment and other affirmative action efforts...to ensure that the planned levels of participation are realized. If service levels by prime sponsors to a significant segment (age, race, sex, or national origin group) differ by more than 15 percent from the levels set forth in the approved CETP, the RA shall require corrective action of any prime sponsor which is not able to adequately justify the variance.* (676.53(c))

This would mean that, for example, if women were 55 percent of the eligible population they should represent between 40 and 70 percent of those served by the prime sponsor. But remember, look at more than just total numbers served. What percentage are women of those who received vocational training? On-the-job training? Public service employment? Upgrading? What kinds of jobs did they get?

Tucked away at the end of one of the paragraphs on equitable provision of services is a potent little sentence.

> *Prime sponsors may design programs and services to assist specific target groups.* (676.53(b))

This sentence was written at the highest policy levels of the Department of Labor in order to clear up confusion that had existed under earlier versions of the regulations. Some prime sponsors, faced with the extensive and detailed requirements of nondiscrimination, equal opportunity, and equitable provision of services, had felt that it might be illegal to establish certain of their programs and/or services for just a single target group. This is not true, and the quote above now makes that clear.

This means that if you are running a program that is designed especially for one of the prime sponsor's target groups, you cannot be refused a contract to provide that service for the prime sponsor on the grounds that your program is discriminatory. (You can be turned down for other reasons, of course, but not discrimination.)

This quote can also be used to encourage prime sponsors themselves to initiate programs targeted specifically for women, particularly if you have been able to demonstrate that women are underserved in one or more areas of the existing program.

PROCEDURES FOR SERVING SPECIFIC TARGET GROUPS

As explained in the section on the Prime Sponsor Planning Process, prime sponsors must provide a breakout of the significant segments of the eligible population, and must then determine priorities for who is to receive their services. Section 676.30a of the regulations establishes procedures for serving these specific target groups. This section says, in essence, that prime sponsors must give special consideration to certain groups when they are establishing priorities of service, and they must make extra efforts to reach individuals in these groups once the priorities have been established. Regarding public service employment (PSE) specifically:

> *Recipients (prime sponsors) shall provide special emphasis to eligible persons who are...women, single parents, displaced homemakers... (676.30a(b)(3)(i))*

Others are included in this group, but these will probably be the focus of your attention. The section continues with the following:

> *Such special emphasis shall include, but not be limited to, taking into consideration the needs of these groups when developing program services and activities, establishing outreach procedures to facilitate the participation of such groups and other steps as the recipient determines to be appropriate. (676.30a(b)(3)(ii))*

The special emphasis on women, single parents, and displaced homemakers shall include not only taking their needs into consideration when developing the program but also shall include establishing outreach procedures to reach these groups. Then the regulations get even more specific.

> *Special efforts (e.g., newspaper notices) shall be made to acquaint these groups with the services and activities available under the Act and to coordinate those efforts with other programs serving such persons. (676.30a(b)(3)(iii))*

When running a PSE program the prime sponsor is required to make "special efforts" to coordinate with other programs serving the persons who are to receive special emphasis. That means women--and that means you. Are you involved in a program that's serving women? Then make it easy on the prime sponsor, let him/her know you're there. Go in and explain your program. Be prepared with specific suggestions for coordination that will benefit both programs: yours and CETA. Find out what the prime sponsor staff feels their needs are. Can you help? A cooperative and friendly working relationship is a very strong basis for later suggestions and recommendations.

WHEN, WHERE, AND HOW TO APPEAL

What if you have a complaint that you are unable to resolve with the prime sponsor? The first thing to do is to go back and try again. You should make every effort to resolve a complaint informally before filing a formal complaint. Make sure you are talking to the appropriate persons (prime sponsor staff, project director, program planner, etc.), and that your argument is logically organized and supported by incontrovertible facts and specific references to the regulations. Higher action on a formal complaint is often influenced by how much effort the complainant put into resolving the issue at a lower level.

If informal measures fail, ask for a copy of the prime sponsor's complaint procedure. (He/she is required to have one, and just asking for it may soften their stance.) A formal complaint must be in writing, and if you have already established the habit of putting <u>everything</u> in writing you probably have all the necessary documentation to support your complaint. The written complaint should contain the following information:

(1) Complainant's name, phone number, address, and that of the prime sponsor, and the date. (<u>Any</u> individual or group may file a complaint.)

(2) A clear, concise, chronological statement of the facts constituting the alleged violation, including pertinent dates.

(3) A citation of the provisions of the Act, regulations, and plans believed to have been violated.

(4) The signature of the complainant, sworn before a notary public.

The prime sponsor's complaint procedure will stipulate a period of time within which the prime sponsor must respond to the complaint. If the prime sponsor does not respond within that period of time, or if you are not satisfied with the decision, you may make an appeal to the Regional Administrator of the Employment and Training Administration of the Department of Labor. The RA must then make a prompt and formal investigation of the charges and may, if your charges are upheld, order the prime sponsor to take corrective action.

After the RA's decision, either you or the prime sponsor may request a hearing by an Administrative Law Judge, and this decision is generally the final one unless the Secretary of Labor modifies or vacates it within a stipulated period of time. Complaints involving discrimination may also be filed with the Equal Employment Opportunity Commission.

The formal complaint procedure can be a lengthy, time-consuming, and complex process--often fraught with frustrations. For this reason it is important to do everything possible to resolve differences of opinion at the lowest possible level. But if you can't, and if you know you're right, don't hesitate to follow through. Just do your homework first.

SUMMARY

Although the CETA journey ends here, it should mark the beginning of action for you. And it is important to keep in mind that as you increase your knowledge of CETA and how it should operate you increase your power to effectuate change for women.

It is also important to be aware that the implementation of CETA is every bit as much a political process as was passage of its legislation. Your success in affecting its impact on women will be in direct proportion to your knowledge, your tenacity, and the number of like-minded contacts you can establish.

GLOSSARY

Artificial Barriers to Employment--limitations (such as age, sex, race, national origin, parental status, credential requirements, criminal record, lack of child care, physical or mental status, and absence of part-time or alternative working patterns/schedules) in hiring, firing, promotion, licensing, and conditions of employment which are not directly related to an individual's fitness or ability to perform the tasks required by the job.

Community Based Organization (CBO)--a private nonprofit organization which is representative of the community or a significant segment of the community, and which provides employment and training services or activities.

Comprehensive Employment and Training Plan (CETP)--the prime sponsor's plan for operating programs under the Act, consisting of the Master Plan (long term agreement between a prime sponsor and the Department of Labor) and the Annual Plan (yearly description of program activities and services to be provided by the prime sponsor).

Displaced Homemaker--an individual who (1) has not worked in the labor force for a substantial number of years but has, during those years, worked in the home providing unpaid services for family members; and (2) has been dependent on public assistance or on the income of another family member but is no longer supported by that income; or is receiving public assistance on account of dependent children in the home, especially where such assistance will soon be terminated; and (3) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Economically Disadvantaged--a person who is either: (1) a member of a family which receives public assistance; (2) a member of a family whose income during the previous 6 months on an annualized basis was such that the family would have qualified for public assistance, if it had applied for such assistance; or it does not exceed the poverty level; or it does not exceed 70 percent of the lower living standard income level; (3) a foster child on whose behalf State or local government payments are made; (4) where such status represents significant barriers to employment; a client of a sheltered workshop, a handicapped individual, a person residing in an institution or facility providing 24-hour support such as a prison, a hospital, or a community care facility, or a regular outpatient of a mental hospital, rehabilitation facility, or similar institution.

Prime Sponsor--a unit of government or a combination of units of government which have entered into a grant with the Department of Labor to provide comprehensive employment and training services. There are generally three types of prime sponsors.

1. Local prime sponsor--a city or county government with a population of 100,000 or more which operates a CETA program by itself.
2. Balance of State prime sponsor--the area within the jurisdiction of a State which is not included in another prime sponsor's area.
3. Consortium prime sponsor--an entity formed by an agreement among two

or more local units of government to operate the CETA program. (At least one member of a consortium must be an eligible prime sponsor on its own.)

"Prime sponsor" generally refers to the highest elected official (for example, mayor, county supervisor, Governor) of any political jurisdiction.

Program of Demonstrated Effectiveness--a program which has demonstrated the capacity to achieve planned goals at reasonable cost within acceptable timeframes, and can demonstrate that it has performed effectively.

Regional Administrator (RA)--the person who heads the regional office of the Department of Labor's Employment and Training Administration. (The Women's Bureau also has RA's.)

Request for Proposal (RFP)--a document frequently used by prime sponsors to obtain funding proposals from the community. With the RFP system, the prime sponsor sends funding proposal requests to community agencies. Generally, proposals are evaluated according to established criteria, then the award is made.

Significant Segments--groups of the population identified by the following demographic characteristics: age, sex, race, and national origin.

CETA Program Eligibility Estimates for the United States, Regions, and States, by Sex, 1978[1/]

	Youth programs[2/]				Adult-oriented programs[3/]			
	Total	Women	Men	Women as a percent of total	Total	Women	Men	Women as a percent of total
United States	9,173,000	4,835,000	4,338,000	52.7	14,083,000	8,140,000	5,943,000	57.8
Region I	420,000	229,000	191,000	54.5	711,000	435,000	276,000	61.2
Connecticut	72,000	46,000	26,000	63.9	136,000	96,000	40,000	70.6
Maine	55,000	28,000	27,000	51.0	71,000	38,000	33,000	53.5
Massachusetts	208,000	112,000	96,000	53.8	372,000	226,000	146,000	60.8
New Hampshire	20,000	11,000	9,000	55.0	22,000	12,000	10,000	54.5
Rhode Island	43,000	20,000	23,000	46.5	79,000	48,000	31,000	60.8
Vermont	22,000	12,000	10,000	54.5	31,000	15,000	16,000	48.4
Region II	1,085,000	575,000	510,000	53.0	1,721,000	1,053,000	668,000	61.2
New Jersey	277,000	167,000	110,000	60.3	400,000	256,000	144,000	64.0
New York	808,000	408,000	400,000	50.5	1,321,000	797,000	524,000	60.3
Region III	984,000	523,000	461,000	53.2	1,576,000	876,000	700,000	55.6
Delaware	29,000	11,000	17,000	37.9	38,000	20,000	18,000	52.6
District of Columbia	38,000	22,000	16,000	57.9	74,000	46,000	28,000	62.2
Maryland	126,000	69,000	57,000	54.8	226,000	119,000	107,000	52.7
Pennsylvania	489,000	256,000	233,000	52.4	857,000	474,000	383,000	55.3
Virginia	214,000	116,000	98,000	54.2	261,000	158,000	103,000	60.5
West Virginia	89,000	49,000	40,000	55.1	119,000	58,000	61,000	48.7
Region IV	1,891,000	1,014,000	877,000	53.6	2,719,000	1,541,000	1,178,000	56.7
Alabama	248,000	128,000	120,000	51.6	316,000	184,000	132,000	58.2
Florida	417,000	233,000	184,000	55.9	611,000	351,000	260,000	57.4
Georgia	248,000	136,000	112,000	54.8	366,000	209,000	157,000	57.1
Kentucky	169,000	80,000	89,000	47.3	200,000	111,000	89,000	55.5
Mississippi	173,000	96,000	77,000	55.5	270,000	161,000	109,000	59.6
North Carolina	223,000	122,000	101,000	54.7	346,000	181,000	165,000	52.3
South Carolina	179,000	90,000	89,000	50.3	255,000	151,000	104,000	59.2
Tennessee	235,000	130,000	105,000	55.3	356,000	195,000	161,000	54.8

CETA Program Eligibility Estimates for the United States, Regions, and States, by Sex, 1978[1/] -- Continued

	Youth programs[2/]				Adult-oriented programs[3/]			
	Total	Women	Men	Women as a percent of total	Total	Women	Men	Women as a percent of total
Region V	1,553,000	810,000	743,000	52.2	2,451,000	1,474,000	977,000	60.1
Illinois	399,000	201,000	198,000	50.4	656,000	408,000	248,000	62.2
Indiana	190,000	106,000	84,000	55.8	250,000	152,000	98,000	60.8
Michigan	322,000	159,000	163,000	49.4	558,000	321,000	237,000	57.5
Minnesota	121,000	63,000	58,000	52.1	172,000	95,000	77,000	55.2
Ohio	372,000	196,000	176,000	52.7	606,000	363,000	243,000	59.9
Wisconsin	150,000	85,000	65,000	56.7	208,000	135,000	73,000	64.9
Region VI	1,119,000	542,000	577,000	48.4	1,454,000	796,000	658,000	54.7
Arkansas	132,000	61,000	71,000	46.2	216,000	114,000	102,000	52.8
Louisiana	233,000	113,000	120,000	48.5	297,000	162,000	135,000	54.5
New Mexico	73,000	34,000	39,000	46.6	106,000	54,000	52,000	50.9
Oklahoma	115,000	51,000	64,000	44.3	153,000	89,000	64,000	58.2
Texas	567,000	284,000	283,000	50.1	682,000	377,000	305,000	55.3
Region VII	477,000	261,000	216,000	54.7	728,000	443,000	285,000	60.8
Iowa	111,000	60,000	51,000	54.1	141,000	80,000	61,000	56.7
Kansas	80,000	46,000	34,000	57.5	153,000	96,000	57,000	62.7
Missouri	231,000	124,000	107,000	53.7	351,000	214,000	137,000	61.0
Nebraska	56,000	32,000	24,000	57.1	82,000	52,000	30,000	63.4
Region VIII	273,000	145,000	128,000	53.1	357,000	187,000	170,000	52.4
Colorado	117,000	63,000	54,000	53.8	156,000	86,000	70,000	55.1
Montana	33,000	14,000	19,000	42.4	42,000	18,000	24,000	42.9
North Dakota	31,00	16,000	15,000	51.6	43,000	22,000	21,000	51.2
South Dakota	35,000	19,000	16,000	54.3	45,000	23,000	22,000	51.1
Utah	46,000	27,000	19,000	58.7	55,000	32,000	23,000	58.2
Wyoming	11,000	6,000	5,000	54.5	16,000	7,000	9,000	43.8

CETA Program Eligibility Estimates for the United States, Regions, and States, by Sex, 1978[1/] -- Continued

	Youth Programs[2/]				Adult-oriented programs[3/]			
	Total	Women	Men	Women as a percent of total	Total	Women	Men	Women as a percent of total
Region IX	1,093,000	583,000	510,000	53.3	1,918,000	1,081,000	837,000	56.4
Arizona	105,000	55,000	50,000	52.3	165,000	78,000	87,000	47.3
California	936,000	502,000	434,000	53.6	1,660,000	947,000	713,000	57.0
Hawaii	33,000	16,000	17,000	48.5	70,000	39,000	31,000	55.7
Nevada	20,000	10,000	10,000	50.0	25,000	18,000	7,000	72.0
Region X	275,000	152,000	123,000	55.3	446,000	252,000	194,000	56.5
Alaska	18,000	8,000	10,000	44.0	25,000	12,000	13,000	48.0
Idaho	29,000	15,000	14,000	51.7	40,000	23,000	17,000	57.5
Oregon	91,000	52,000	39,000	57.1	166,000	98,000	68,000	59.0
Washington	137,000	78,000	59,000	56.9	216,000	120,000	96,000	55.6

-29-

1/ CETA eligibility estimates were derived from the Current Population Survey, 1976 Survey of Income and Education, and the March Current Population Surveys of 1977 and 1978.

2/ These persons are at least 14 years old and under 22 years of age, and they are eligible for Summer Youth Employment Programs (SYEP), and nonsummer youth programs which consist of: Youth Employment and Training Program (YETP)--Classroom training, Youth Employment and Training Program (YETP)--work experience, Youth Community Conservation Improvement Program (YCCIP) and Youth Work Experience (YWE).

3/ These persons are generally 22 years and over, but some persons under 22 are eligible. Data for 1978 show that 27 percent of the women enrolled in adult-oriented programs were under 22 years of age. These programs include five types of program assignments: classroom training (CT), on-the-job training (OJT), adult work experience (AWE), public service employment (PSE), and direct-referral (DR).

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Washington, D.C. 20210

Assessing Local CETA Services for Women (1980)
A well-documented and useful guide to monitoring CETA services to women. Proposed by CETA and Wisconsin Women Project.

Governor's Employment and Training Office
30 W. Mifflin Street
Room 501
Madison, Wisconsin 53703

CETA: A Citizen Action Guide (1979)
A clear, concise outline of the provisions of the CETA titles and suggested action strategies for citizen groups.

Center for Community Change
1000 Wisconsin Ave., N.W.
Washington, D.C. 20007
Cost: $2.00

Code of Federal Regulations for CETA legislation
The official CETA regulations.

U.S. Government Printing Office
Superintendent of Documents
Washington, D.C. 20402

How To Tame the CETA Beast (1979)
An entertaining and well written advocacy manual for older women.

Older Women's League
Educational Fund
3800 Harrison St.
Oakland, California 94611

Monitoring Your CETA Program: Community Guide (1979)
A compact pamphlet for local leagues and other citizen groups. Sources of information, what to monitor, appropriate action.

League of Women Voters
Educational Fund
1730 M Street, N.W.
Washington, D.C. 20036
Cost: 40¢

Forms Preparation Handbook

Employment and Training Administration
601 D St., N.W.
Room 5317
Washington, D.C. 20213

EMPLOYMENT AND TRAINING ADMINISTRATION REGIONAL OFFICES AND STATES THEY SERVE

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Seattle, Wash. 98174
(Alaska, Idaho, Oregon, Washington)

STATE CETA CONTACTS

REGION I

Connecticut
Office of Employment
and Training
200 Folly Brook Blvd.
Wethersfield, Conn. 06109

Maine
Office of CETA Planning &
Coordination
Hospital Street
Augusta, Maine 04330

Massachusetts
CETA Director
Executive Office of Economic Affairs
Charles F. Hurley Building
Government Center
Boston, Mass. 02114

New Hampshire
Office of Employment and Training
P.O. Box 1477
Concord, N.H. 03301

Rhode Island
Dept. of Economic Development
Division of Job Development & Training
5 Cathedral Sq., 5th Floor
Providence, R.I. 02903

Vermont
Vermont CETA
State Office Building
Montpelier, Vt. 05602

REGION II

New Jersey
Manpower Revenue Program
Labor & Industry Building
John Fitch Plaza, Room 1102
Trenton, N.J. 08625

New York
N.Y. State Department of Labor
CETA Operations Division
State Campus Bldg. #12
Albany, N.Y. 12240

Puerto Rico
Administracion Del Derecho al
Trabajo
GPO Box 4452
Hato Rey, P.R. 00923

Virgin Islands
Commissioner of Labor
V.I. Dept. of Labor
P.O. Box 890, Christiansted
St. Croix, V.I. 00820

REGION III

Delaware
State Manpower Services Council
701 Shipley St.
Wilmington, Del. 19801

District of Columbia
CETA Director
D.C. Dept. of Labor
500 "C" St., NW-Room 600
Washington, D.C. 20001

Maryland
State Manpower Planning Council
1123 North Eutaw St.
Baltimore, Md. 21201

Pennsylvania
Dept. of Labor and Industry
1715 Labor and Industry Bldg.
Harrisburg, Pa. 17120

Virginia
Virginia Employment Commission
CETA-4th Floor
111 S. 6th St.
Richmond Plaza Bldg.
Richmond, Va. 23210

West Virginia
Governor's Office of Economic and
Community Development
Employment and Training Division
State of West Virginia
5790A MacCorkle Avenue, S.E.
Charleston, W. Va. 25305

REGION IV

Alabama
State CETA Director
Department of Industrial Relations
Industrial Relations Building
649 Monroe St.
Montgomery, Ala. 36130

Florida
Florida Office of Manpower Planning
2551 Executive Center Circle West
Tallahassee, Fla. 32301

Georgia
Employment Security Agency
501 Pulliam St., Rm. 406
Atlanta, Ga. 30312

Kentucky
CETA Programs
Bureau for Manpower Services
Dept. for Human Resources
275 E. Main St.
Frankfort, Ky. 40621

Mississippi
Programs Division
Office of the Governor-Job Development and Training
P.O. Box 22808
Jackson, Miss. 39205

North Carolina
Division of Community Employment
P.O. Box 27687
Raleigh, N.C. 27611

South Carolina
Office of the Governor
CETA Division
1800 St. Julian Place
Columbia, S.C. 29204

Tennessee
Executive Director
Cordell Hull Bldg., Rm. 354
Nashville, Tenn. 37219

REGION V

Illinois
CETA Director
Illinois Dept. of Commerce and Community Affairs
222 S. College
Springfield, Ill. 62706

Indiana
Indiana Office of Manpower Development
150 W. Market St., 7th Floor
Indianapolis, Ind. 46204

Michigan
Bureau of Employment & Training
Michigan Department of Labor
State Secondary Complex, 3rd Floor
7150 Harris Drive
Lansing, Mich. 48909

Minnesota
Office of Statewide CETA Coordination
Dept. of Economic Security
690 American Civic Building
150 E. Kellogg Blvd.
St. Paul, Minn. 55101

Ohio
Office of Manpower Development
Ohio Dept. of Administrative Services
30 East Broad Street
Columbus, Ohio 43215

Wisconsin
Governors Employment and Training Office
30 W. Mifflin St.
Madison, Wis. 53703

REGION VI

Arkansas
CETA Administrator
2020 West Third St.
P.O. Box 5162
Hillcrest Station
Little Rock, Ark. 72205

Louisiana
CETA Director
Louisiana Dept. of Labor
P.O. Box 44094
Baton Rouge, La. 70804

New Mexico
Governor's Office of ETA
P.O. Box 4218
Sante Fe, N. Mex. 87502

Oklahoma
Manpower Planning Division
Dept. of Economic and Community Affairs
5500 North Western
Oklahoma City, Okla. 73118

Texas
Texas Department of Community Affairs
210 Barton Springs Rd.
P.O. Box 13166, Capitol Station
Austin, Tex. 78711

REGION VII

Iowa
CETA Director
Office for Planning & Programming
523 East 12th St.
Des Moines, Iowa 50319

Kansas
Dept. of Human Resources
9th Floor, 535 Kansas Ave.
Topeka, Kans. 66603

Missouri
Office of Manpower Planning
226 East Dunklin St.
Jefferson City, Mo. 65101

Nebraska
CETA Office
P.O. Box 82427
124 No. 11th St.
Lincoln, Neb. 68501

REGION VIII

Colorado
Dept. of Labor and Employment
251 E. 12th Ave.
Denver, Colo. 80203

Montana
Governor's Employment and Training Council
35 S. Last Chance Gulch
Helena, Mont. 59601

North Dakota
Job Service North Dakota
P.O. Box 1537
Bismarck, N. Dak. 58505

South Dakota
South Dakota Dept. of Labor
P.O. Box 307
Pierre, S. Dak 57501

Utah
Utah Office of Labor & Training
1331 South State St., Suite 300
Salt Lake City, Utah 84115

Wyoming
Division of Manpower Planning
State Planning Office
State Office Capitol
821 W. Pershing Blvd.
Cheyenne, Wyo. 82002

REGION IX

Arizona
Office of Manpower Planning
P.O. Box 6123
Phoenix, Ariz. 85005

California
CETA Balance of State
800 Capitol Mall, MIC 39
Sacremento, Calif. 95814

Hawaii
Office of Manpower Planning
1164 Bishop St., Suite 600
Honolulu, Hawaii 96813

Nevada
Employment and Security Department
500 East Third Street
Carson City, Nev. 89701

Guam
Office of the Governor
P.O. Box 2950
Agana, Guam 96910

American Samoa
Office of Manpower Resources
Government of American Samoa
Pago Pago, American Samoa 96799

Trust Territory of the Pacific Islands
Program Coordinator
Trust Territory of the Pacific Islands
Saipan, Mariania Island 96950

Northern Mariana Islands
Commonwealth of the Northern
Mariana Islands
Office of the Governor
Training Office
Civic Center
Saipan, Mariania Island 96950

REGION X

Alaska
Community Employment and Training
Assistance Division
Department of Community and
Regional Affairs
Pouch BC
Juneau, Alaska 99811

Idaho
Idaho Manpower Consortium
P.O. Box 35
Boise, Idaho 83735

Oregon
Employment Division
State of Oregon
875 Union St., NE
Salem, Ore. 97311

Washington
Employment Security Department
Employment and Training Division
1007 S. Washington St., MS-EL-01
Olympia, Wash. 98504

APPENDIX F

WOMEN'S BUREAU REGIONAL OFFICES AND STATES THEY SERVE

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Room 1001-B JFK Bldg.
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1371 Peachtree St., N.E.
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911 Walnut St.
Kansas City, Mo. 64106
(Iowa, Kansas, Missouri, Nebraska)

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1961 Stout St.
Denver, Colo. 80202
(Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)

REGION IX

Room 11411, Federal Bldg.
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San Francisco, Calif. 94102
(Arizona, California, Hawaii, Nevada)

REGION X

Room 3032, Federal Office Bldg.
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Seattle, Wash. 98174
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